

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Plaintiffs Fund Texas Choice, The North	§	
Texas Equal Access Fund, The Lilith Fund	§	
for Reproductive Equity, Frontera Fund,	§	
The Afiya Center, West Fund, Jane’s Due	§	
Process, Clinic Access Support Network, and	§	
Dr. Ghazaleh Moayed, DO, MPH, FACOG,	§	
	§	
Plaintiffs,	§	
vs.	§	CASE NO. 1:22-cv-00859-RP
	§	
KEN PAXTON, in his Official Capacity as	§	
Attorney General; et al.,	§	
	§	
Defendants.	§	
	§	

PLAINTIFFS’ WITNESS LIST FOR SEPTEMBER 27, 2022 HEARING

Pursuant to the Federal Rules of Civil Procedure, the Local Rules of this Court, and the Court’s instructions provided to the parties in this matter on September 22, 2022, Plaintiffs respectfully file their Witness List for September 27, 2022 Hearing (“Plaintiffs’ Witness List”). In addition to the witnesses identified on Plaintiffs’ Witness List, Plaintiffs also designate and incorporate by reference all witnesses disclosed on Defendants’ Witness List.

Plaintiffs’ Witness List

WITNESS	DESCRIPTION
Anna Rupani	Plaintiff – Fund Texas Choice
Kamyon Conner	Plaintiff – North Texas Equal Access Fund
Neesha Davé	Plaintiff – Lilith Fund for Reproductive Equity
Zaena Zamora	Plaintiff – Frontera Fund
Marsha Jones	Plaintiff – The Afiya Center
Rachel Cheek	Plaintiff - The West Fund
Rosann Mariappuram	Plaintiff – Jane’s Due Process
Bridget Schilling	Plaintiff – Clinic Access Support Network
Ghazaleh Moayedi	Plaintiff
Attorney General Ken Paxton	Defendant – Attorney General of Texas, in his official capacity
Attorney General Ken Paxton	Third Party Witness, in his personal capacity ¹

¹ Plaintiffs intend to call General Paxton and have served him with Rule 45 Subpoenas in both his official capacity and his personal capacity because Defendant’s counsel has taken the position that certain statements made by General Paxton are not admissible because they were made in his personal capacity, rather than in his official capacity. Plaintiffs do not believe Defendant’s position is correct, but in an abundance of caution, are designating General Paxton as a witness in both his personal and official capacities.

Dated: September 26, 2022

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that this document was filed electronically on September 26, 2022, with the clerk of the Court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court.

/s/ Jennifer R. Ecklund
Jennifer R. Ecklund